

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DANIEL WILLIAMS,)	
)	
Plaintiff,)	
)	
v.)	Case No. 04-CV-10359 DPW
)	
HASSAN M. AHMED, et al.,)	
)	
Defendants,)	
)	
v.)	
)	
SONUS NETWORKS, INC.,)	
)	
Nominal Defendant.)	
MICHELLE BURK,)	
)	
Plaintiff,)	
)	
v.)	Case No. 04-CV-10384 DPW
)	
HASSAN M. AHMED, et al.,)	
)	
Defendants,)	
)	
v.)	
)	
SONUS NETWORKS, INC.,)	
)	
Nominal Defendant.)	
MICHAEL PISNOY,)	
)	
Plaintiff,)	
)	
v.)	Case No. 04-CV-10576 DPW
)	
HASSAN M. AHMED, et al.,)	
)	
Defendants,)	
)	
v.)	
)	
SONUS NETWORKS, INC.,)	
)	
Nominal Defendant.)	

**PLAINTIFF DANIEL WILLIAMS' MOTION FOR LEAVE TO FILE REPLY TO
PLAINTIFFS PISNOY'S AND BURK'S OPPOSITION TO WILLIAMS' MOTION TO
CONSOLIDATE CASES AND APPOINT CO-LEAD AND LIAISON COUNSEL**

Daniel Williams ("Williams"), plaintiff in the derivative action styled *Williams v. Ahmed, et al.*, Case No. 04-CV-10359 (the "*Williams* action" or "*Williams* derivative action") hereby moves, pursuant to Local Rule 7.1(B)(3) for leave to file his Reply to (1) Plaintiff Michael Pisnoy's Opposition to Plaintiff Williams' Motion for Appointment of Lead Counsel for Shareholder Derivative Action; and (2) Plaintiff Michelle Burk's Motion to Consolidate Derivative Cases and Appoint Co-Lead Counsel. Plaintiffs Pisnoy and Burk's Oppositions raise new issues to which Plaintiff Williams should have the opportunity to respond. Accordingly, Swanson seeks to file the attached Reply.

Counsel for Burk does not object to the allowance of this Motion. Counsel for Plaintiff Pisnoy takes no position on whether this Motion should be allowed or denied.

Date: May 24, 2004

Daniel Williams,
By his Attorneys,

/s/ Alan L. Kovacs

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CERTIFICATION PURSUANT TO LOCAL RULE 7.1

The undersigned hereby certifies, pursuant to Local Rule 7.1(a)(2), that either I or my co-counsel have conferred with counsel for Plaintiffs Burk and Pisnoy and that we were unable to narrow or resolve the issues presented by the foregoing Motion for Leave to File Reply Brief.

/s/ Alan L. Kovacs, Esq.

Alan L. Kovacs, Esq

CERTIFICATE OF SERVICE

This certifies that on May 24, 2004 true and correct copies of the above and foregoing were delivered electronically and via first class mail, postage prepaid, to the following:

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